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**BEFORE THE  
BOARD OF PSYCHOLOGY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

KATHLEEN WILLIAMS, PH.D.  
116 N. Maryland Avenue, Suite 200  
Glendale, California 91206

Psychologist License No. PSY 12786  
Respondent.

Case No. W 198

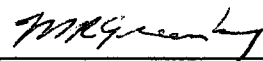
OAH No. L-2000-110458

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Psychology of the Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on October 21, 2001.

It is so ORDERED September 21, 2001.

  
\_\_\_\_\_  
FOR THE BOARD OF PSYCHOLOGY  
DEPARTMENT OF CONSUMER AFFAIRS  
MARTIN R. GREENBERG, Ph.D., PRESIDENT

1 BILL LOCKYER, Attorney General  
of the State of California  
2 CINDY M. LOPEZ, State Bar No. 119988  
Deputy Attorney General  
3 California Department of Justice  
300 South Spring Street, Suite 1702  
4 Los Angeles, California 90013  
Telephone: (213) 897-7373  
5 Facsimile: (213) 897-1071

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
**BOARD OF PSYCHOLOGY**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 KATHLEEN WILLIAMS, PH.D.  
116 N. Maryland Avenue, Suite 200  
13 Glendale, California 91206

14 Psychologist License No. PSY 12786

15 Respondent.

Case No. W 198

OAH No. L-2000-110458

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16  
17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the  
19 above-entitled proceedings that the following matters are true:  
20

21 PARTIES

22 1. Complainant Thomas S. O'Connor is the Executive Officer of the Board of  
23 Psychology. He brought this action solely in his official capacity and is represented in this  
24 matter by Bill Lockyer, Attorney General of the State of California, by Cindy M. Lopez, Deputy  
25 Attorney General.

26 2. Respondent Kathleen Williams, Ph.D. ("Respondent") is represented in  
27 this proceeding by attorney Keith Zwillinger, whose address is 125 S. Highway 101, Suite 101,  
28 Solana Beach, California 92075.

3. On or about March 6, 1992, the Board of Psychology issued Psychologist License Number PSY 12786 to Kathleen Williams, Ph.D. ("Respondent"). The Psychologist License was in full force and effect at all times relevant to the charges brought and will expire on February 28, 2002.

## JURISDICTION

4. Accusation No. W 198, was filed before the Board of Psychology of the Department of Consumer Affairs, ("Board"), and is currently pending against Respondent. The Accusation, together with all other statutorily required documents, was duly served on Respondent on October 18, 2000, and Respondent timely filed her Notice of Defense contesting the Accusation.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read and discussed with her counsel the nature of the charges and allegations in the Accusation and the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation, the right to be represented by counsel, at her own expense, the right to confront and cross-examine the witnesses against her, the right to present evidence and to testify on her own behalf, the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents, the right to reconsideration and court review of an adverse decision, and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

8. Respondent understands that the charges and allegations in the Accusation, if proven at a hearing, constitute cause for imposing discipline upon her Psychologist License.

9. For the purpose of resolving Accusation No. W 198 without the expense and uncertainty of further proceedings, Respondent admits she incorporated out of office experiences and gift exchanges in her psychotherapeutic work with D.V. Respondent now recognizes that such action contributed to a confusion of roles and boundaries for the client, and as such constitutes unprofessional conduct.

10. Respondent agrees that her Psychologist License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Order below.

## CONTINGENCY

11. This stipulation shall be subject to the approval of the Board. Respondent understands and agrees that Board of Psychology's staff and counsel for Complainant may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. If the Board fails to adopt this stipulation as its Order, except for this paragraph the Stipulated Settlement and Disciplinary Order shall be of no force or effect, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the original Stipulated Settlement and Disciplinary Order and signatures.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board shall, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

## DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Psychologist license Number PSY 12786 issued to Respondent Kathleen Williams, Ph.D. is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

14. PRACTICE MONITOR Within 90 days of the effective date of this Decision, respondent shall submit to the Board or its designee for prior approval, the name and

1 qualifications of a psychologist who has agreed to serve as a practice monitor/billing monitor.  
2 The monitor shall 1) be a California-licensed psychologist with a clear and current license; 2)  
3 have no prior business, professional, personal or other relationship with respondent; and 3) not be  
4 the same person as respondent's therapist. The monitor's education and experience shall be in  
5 the same field of practice as that of the respondent.

6 Once approved, the monitor shall submit to the Board or its designee a plan by  
7 which respondent's practice shall be monitored. Monitoring shall consist of a least one hour per  
8 month of individual face to face meetings and shall continue during the first year of probation. At  
9 the end of that first year, the monitor may evaluate respondent's progress, and if the monitor  
10 believes respondent needs further monitoring, it shall continue until such time that the monitor  
11 feels respondent no longer needs a practice monitor. The respondent shall provide the monitor  
12 with a copy of this Decision. Respondent shall execute a release authorizing the monitor to  
13 divulge any information that the Board may request. It shall be respondent's responsibility to  
14 assure that the monitor submits written reports to the Board or its designee on a quarterly basis  
15 verifying that monitoring has taken place and providing an evaluation of respondent's  
16 performance.

17 If the monitor quits or is otherwise no longer available, respondent shall obtain  
18 approval from the Board for a new monitor within 30 days. If no new monitor is approved within  
19 30 days, respondent shall not practice until a new monitor has been approved by the Board or its  
20 designee. During this period of non-practice, probation will be tolled and any period of non-  
21 practice shall not apply to the reduction of this probationary period. Respondent shall pay all  
22 costs associated with this monitoring requirement. Failure to pay these costs shall be considered  
23 a violation of probation.

24 15. JURISPRUDENCE EXAM Respondent shall take the next regularly  
25 scheduled Jurisprudence Exam. If respondent fails the first examination, respondent shall be  
26 allowed to take a second examination. If respondent fails to pass the first and second  
27 examinations, respondent may take a third and final examination. If respondent fails such  
28 examination, respondent shall immediately cease accepting new patients and, in accordance with

1 professional standards, shall appropriately refer/terminate existing patients within 30 days and  
2 shall not resume practice until the re-examination has been successfully passed, as evidenced by  
3 written notice to respondent from the Board or its designee. During this period of non-practice,  
4 probation is tolled and this period of non-practice will not apply to the reduction of this  
5 probationary period. It is respondent's responsibility to contact the Board in writing to make  
6 arrangements for such examination(s). Respondent shall pay the established examination fee(s).

7           17. COURSEWORK Respondent shall take and successfully complete not less  
8 than 12 hours each year of probation in the following areas: transference, counter-transference,  
9 personality disorders, and law and ethics. Coursework must be preapproved by the Board or its  
10 designee. All coursework shall be taken at the graduate level at an accredited educational  
11 institution or by an approved continuing education provider. Classroom attendance is  
12 specifically required; correspondence or home study coursework shall not count toward meeting  
13 this requirement. The coursework must be in addition to any continuing education courses that  
14 may be required for license renewal.

15           Within 90 days of the effective date of this Decision, respondent shall submit to  
16 the Board or its designee for its prior approval a plan for meeting the educational requirements.  
17 All costs of the coursework shall be paid by the respondent.

18           18. ETHICS COURSE Within 90 days of the effective date of this Decision,  
19 respondent shall submit to the Board or its designee for prior approval a course in laws and ethics  
20 as they relate to the practice of psychology. Said course must be successfully completed at an  
21 accredited educational institution or through a provider approved by the Board's accreditation  
22 agency for continuing education credit. Said course must be taken and completed within one  
23 year from the effective date of this Decision. The cost associated with the law and ethics course  
24 shall be paid by the respondent.

25           19. INVESTIGATION/ENFORCEMENT COST RECOVERY Respondent  
26 shall pay the Board its costs of investigation and enforcement in the amount of \$2,500 which is  
27 due for costs of investigation and must be paid in full within the first year and a half of  
28 probation. Such costs shall be payable to the Board of Psychology. Failure to pay such costs

1 shall be considered a violation of probation.

2 The filing of bankruptcy by respondent shall not relieve respondent of the  
3 responsibility to repay investigation and enforcement costs

4 20. PROBATION COSTS Respondent shall pay the costs associated with  
5 probation monitoring each and every year of probation. Such costs shall be payable to the Board  
6 of Psychology at the end of each fiscal year (July 1 - June 30). Failure to pay such costs shall be  
7 considered a violation of probation. The probation costs shall not exceed \$175 per month.

8 The filing of bankruptcy by respondent shall not relieve respondent of the  
9 responsibility to repay investigation and enforcement costs

10 21. OBEY ALL LAWS Respondent shall obey all federal, state, and local laws  
11 and all regulations governing the practice of psychology in California including the ethical  
12 guidelines of the American Psychological Association. A full and detailed account of any and all  
13 violations of law shall be reported by the respondent to the Board or its designee in writing  
14 within seventy-two (72) hours of occurrence.

15 22. QUARTERLY REPORTS Respondent shall submit quarterly declarations  
16 under penalty of perjury on forms provided by the Board or its designee, stating whether there  
17 has been compliance with all the conditions of probation.

18 23. PROBATION COMPLIANCE Respondent shall comply with the Board's  
19 probation program and shall, upon reasonable notice, report to the assigned District Office of the  
20 Medical Board of California or other designated probation monitor. Respondent shall contact the  
21 assigned probation officer regarding any questions specific to the probation order. Respondent  
22 shall not have any unsolicited or unapproved contact with 1) complainants associated with the  
23 case; 2) Board members or members of its staff; or 3) persons serving the Board as expert  
24 evaluators.

25 24. INTERVIEW WITH BOARD OR ITS DESIGNEE Respondent shall appear  
26 in person for interviews with the Board or its designee upon request at various intervals and with  
27 reasonable notice.

28 25. CHANGES OF EMPLOYMENT Respondent shall notify the Board in

1 writing, through the assigned probation officer, of any and all changes of employment, location,  
2 and address within 30 days of such change.

3           26. TOLLING FOR OUT-OF-STATE PRACTICE, RESIDENCE OR IN-  
4 STATE NON-PRACTICE In the event respondent should leave California to reside or to  
5 practice outside the State or for any reason should respondent stop practicing psychology in  
6 California, respondent shall notify the Board or its designee in writing within ten days of the  
7 dates of departure and return or the dates of non-practice within California. Non-practice is  
8 defined as any period of time exceeding thirty days in which respondent is not engaging in any  
9 activities defined in Sections 2902 and 2903 of the Business and Professions Code. Periods of  
10 temporary or permanent residency or practice outside California or of non-practice within  
11 California will not apply to the reduction of this probationary period., although the Board may  
12 allow respondent to complete certain terms of probation that are not associated with active  
13 practice.

14           27. EMPLOYMENT AND SUPERVISION OF TRAINEES If respondent is  
15 licensed as a psychologist, he/she shall not employ or supervise or apply to employ or supervise  
16 psychological assistants, interns or trainees during the course of this probation. Any such  
17 supervisory relationship in existence on the effective date of this probation shall be terminated  
18 by respondent and/or the Board.

19           28. FUTURE REGISTRATION OR LICENSURE If respondent is currently  
20 registered as a psychological assistant and subsequently obtains other psychological assistant  
21 registrations or becomes licensed as a psychologist during the course of this probationary order,  
22 respondent agrees that this Decision shall remain in full force and effect until the probationary  
23 period is successfully terminated. Future registration or licensure shall not be approved,  
24 however, until respondent is currently in compliance with all of the terms and conditions of  
25 probation.

26           29. VIOLATION OF PROBATION If respondent violates probation in any  
27 respect, the Board may, after giving respondent notice and the opportunity to be heard, revoke  
28 probation and carry out the disciplinary order that was stayed. If an Accusation or Petition to



1 Revoke Probation is filed against respondent during probation, the Board shall have continuing  
2 jurisdiction until the matter is final, and the period of probation shall be extended until the matter  
3 is final. No Petition for Modification or Termination of Probation shall be considered while  
4 there is an Accusation or Petition to Revoke Probation pending against respondent.

5 30. COMPLETION OF PROBATION Upon successful completion of  
6 probation, respondent's license shall be fully restored.

7  
8  
9 ACCEPTANCE


10 I have carefully read the above Stipulated Settlement and Disciplinary Order and  
11 have fully discussed the terms and conditions and other matters contained therein with my  
12 attorney Keith Zwillinger, I understand the effect this stipulation will have on my Psychologist  
13 License. I enter into this Stipulated Settlement voluntarily, knowingly and intelligently and  
14 agree to be bound by the Disciplinary Order and Decision of the Board of Psychology. I further  
15 agree that a facsimile copy of this Stipulated Settlement and Disciplinary Order, including  
16 facsimile copies of signatures, may be used with the same force and effect as the originals.

17 DATED: July 23, 2001

18  
19   
20 KATHLEEN WILLIAMS, PH.D.  
21 Respondent

22 I have read and fully discussed with Respondent Kathleen Williams, Ph.D. the  
23 terms and conditions and other matters contained in the above Stipulated Settlement and  
24 Disciplinary Order. I approve its form and content.

25 DATED: 7/27/01

26  
27   
28 KEITH ZWILLINGER  
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Psychology of the Department of Consumer Affairs.

DATED: August 24, 01.

BILL LOCKYER, Attorney General  
of the State of California

Cindy M. Lopez  
CINDY M. LOPEZ  
Deputy Attorney General

Attorneys for Complainant

DOJ Docket Number: 03598160-LA2000AD1350  
Stipulation 11/9/00

1 BILL LOCKYER, Attorney General  
of the State of California  
2 CINDY M. LOPEZ, State Bar No. 119988  
Deputy Attorney General  
3 California Department of Justice  
300 South Spring Street, Suite 1702  
4 Los Angeles, California 90013  
Telephone: (213) 897- 7373  
5 Facsimile: (213) 897-1071

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
9 **BOARD OF PSYCHOLOGY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. W 198

12 KATHLEEN WILLIAMS PH.D  
116 North Maryland Ave. Suite 200  
13 Glendale, California 91206

**A C C U S A T I O N**

14 Psychologist Certificate No. PSY 12786

15 Respondent

16  
17 Complainant alleges:

18 PARTIES

19 1. Thomas S. O'Connor ("Complainant") brings this accusation solely in his  
20 official capacity as the Executive Officer of the Board of Psychology, Department of Consumer  
21 Affairs.

22 2. On or about March 6, 1992, the Board of Psychology issued Psychologist  
23 Certificate Number PSY 12786 to Kathleen Williams, Ph.D ("Respondent"). The Psychologist  
24 Certificate was in full force and effect at all times relevant to the charges brought herein and will  
25 expire on February 28, 2002.  
26  
27  
28

JURISDICTION

3. This Accusation is brought before the Board of Psychology ("Board"), under the authority of the following sections of the Business and Professions Code ("Code").

4. Section 2960 of the Code provides that the Board may refuse to issue or may issue with terms and conditions, or may suspend or revoke the registration or license if the applicant, registrant or licensee has been guilty of unprofessional conduct.

Unprofessional conduct shall include, but not be limited to:

(j) Being grossly negligent in the practice of his or her profession.

(k) Violating any of the provisions of this chapter or regulations duly adopted thereunder.

(n) The commission of any dishonest, corrupt, or fraudulent act.

(o) Any act of sexual abuse, or sexual relations with a patient, or sexual misconduct which is substantially related to the qualifications, functions or duties of a psychologist or psychological assistant.

(p) Functioning outside of his or her particular field or fields of competence as established by his or her education, training, and experience.

(r) Repeated acts of negligence.

5. Section 2964.6 of the Code states:

An administrative disciplinary decision that imposes terms of probation may include, among other things, a requirement that the licensee who is being placed on probation pay the monetary costs associated with monitoring the probation.

6. Section 125.3 of the Code states, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINE

(Gross Negligence)

7. Respondent is subject to disciplinary action under section 2960 of the

1 Business and Professions Code in that her conduct with patient D.V. constitutes unprofessional  
2 conduct. The circumstances are as follows:

3 A. FACTS

4 1. On or about December 1994, patient D.V. saw an advertisement in the Lesbian  
5 News for respondent. Patient D.V. had been "abandoned " by her previous therapist, and  
6 told respondent about these issues at the outset of treatment.

7 2. Respondent agreed to provide therapy to patient D.V. and to accept  
8 Medicare/Medi-Cal with no co-payments. Treatment commenced immediately thereafter  
9 and continued until October 1999.

10 3. On or about September 1995, patient D.V. was appointed to a position on the  
11 West Hollywood Advisory Board for Disabled Persons. On this occasion, respondent  
12 brought patient D.V. a corsage as a congratulatory gift. Patient D.V. did not like the fact  
13 that her therapist had purchased a gift for her, and she began to experience confusion  
14 regarding the therapist/patient relationship.

15 4. Patient D.V. informed respondent of her disapproval of the receipt of the gift,  
16 and that she thought of it as charity, however, respondent explained that the corsage  
17 showed that she cared about her. Patient D.V. had experienced boundary violations with  
18 her previous therapist and explained this to respondent, however, respondent told her that  
19 patient D.V.'s attitude about the gift was making respondent feel bad.

20 5. On each birthday and every Christmas for the years 1995 through 1998,  
21 respondent purchased gifts for patient D.V, including earrings, a vase, bath lotion, bath  
22 beads, a loofah, tea mugs, tea blends, tea strainer, a journal, a photograph album, and  
23 baked goods. On or about October 1998, respondent gave patient D.V. candle holders as  
24 a housewarming gift. When patient D.V. was going on a trip, respondent gave her  
25 crossword puzzle books. On one birthday, respondent offered to take patient D.V.  
26 shopping and buy her a gift. This was upsetting to D.V. and made her feel like a child,  
27 and D.V. refused the offer.  
28

1           6. In or about 1995 or 1996 respondent told patient D.V. that she loved her, not in  
2 a sexual manner, but in a caring one. Patient D.V. believed that she and respondent  
3 shared a "special relationship."

4           7. Respondent told patient D.V. that she was her favorite patient, and the only  
5 patient that she felt comfortable crying in front of. Respondent cried in front of patient  
6 D.V. on two separate occasions- once when respondent's mother passed away, and on  
7 another occasion.

8           8. In 1995, respondent, while on vacation, sent postcards to patient D.V.  
9 signing them, love, Kathleen, or fondly, Kathleen. This served to strengthen patient  
10 D.V.'s belief that there existed more than a therapist/patient relationship.

11           9. On several occasions, respondent told patient D.V. about her personal life, yet,  
12 if patient D.V. asked a personal question, respondent would tell her that it was none of  
13 her business.

14           10. Respondent took patient D.V. on "outings," and called the trips therapy.  
15 During the "outings," only respondent and patient D.V. were present. They went to  
16 restaurants for meals on at least five occasions, to the Huntington Gardens on a Sunday,  
17 where they took pictures together, to the zoo, to the Glendale Galleria, and to a movie.  
18 Patient D.V. paid her own way during each outing.

19           11. Respondent told patient D.V. that she was the only patient that she took on  
20 "outings."

21           12. On one occasion, respondent asked patient D.V. to go and visit a tattoo parlor  
22 together, but patient D.V. refused.

23           13. On or about October, 1999, respondent terminated treatment with patient D.V.  
24 without giving an explanation as to why. Approximately two weeks later, respondent  
25 sent her referrals to three other psychologists. Patient D.V. felt abandoned by  
26 respondent's termination of therapy.

27           14. Respondent admitted to expressing her love for patient D.V.  
28

**B. ACTS OF GROSS NEGLIGENCE**

The following acts, singularly and collectively, constitute extreme departures from the standard of care:

1. Engaging in field trips outside the office to Huntington Gardens with patient D.V. and charging patient D.V. for an office visit;
2. Engaging in a field trip outside the office to the Los Angeles Zoo with patient D.V. and charging her for the trip as an office visit;
3. Attending outside the office, patient D.V.'s college graduation, followed by lunch,
4. Attending several other out of the office "outings," such as birthday parties, during sessions, seeing the movie "Gods and Monsters, giving gifts at regular intervals, the lending of tools on at least one occasion, and similar behaviors;
5. Failing to maintain professional boundaries, such as role maintenance, proper structuring of time, maintaining proper place and space, and provision of gifts;
6. Failing to appreciate the inappropriate nature of the boundary violations.
7. Engaging in a dual relationship.
8. Failing to provide psychotherapy sessions in a structured environment.

**SECOND CAUSE FOR DISCIPLINE**

(Repeated Negligent Acts)

8. Respondent is subject to disciplinary action under section 2960, subdivision (r), in that her conduct with patient D.V. constituted repeated acts of negligence.

The circumstances are as follows:

A. Complainant refers to paragraphs 7, subparagraphs (A) and (B) inclusive, above, and by this reference incorporates the facts therein as if set forth fully.

**THIRD CAUSE FOR DISCIPLINE**

(Unprofessional Conduct)

9. Respondent is subject to disciplinary action under section 2960 of the

1 Business and Professions Code in that her conduct with patient D.V. constitutes unprofessional  
2 conduct. The circumstances are as follows:

3 a. Complainant refers to paragraphs 7, subparagraphs (A) and (B)  
4 inclusive, above, and by this reference incorporates the facts therein as if set forth fully.  
5

6  
7 **PRAYER**

8 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
9 alleged, and that following the hearing, the Board of Psychology issue a decision:

10 1. Revoking or suspending Psychologist Certificate No. Number PSY 12786,  
11 issued to Kathleen Williams Ph.D;

12 2. Ordering Kathleen Williams Ph.D to pay the Board of Psychology the  
13 reasonable costs of the investigation and enforcement of this case, and, if placed on probation,  
14 the costs of probation monitoring;

15 3. Taking such other and further action as the Board of Psychology deems  
16 necessary and proper.

17 DATED: October 18, 2000  
18

19  
20 

21 THOMAS S. O'CONNOR  
22 Executive Officer  
23 Board of Psychology  
24 Department of Consumer Affairs  
25 State of California  
26 Complainant  
27  
28



DECLARATION OF SERVICE BY CERTIFIED MAIL

In the Matter of the Accusation Filed  
Against:

Kathleen Williams, Ph.D.

No. : W198

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1422 Howe Avenue, Ste. 22 Sacramento, California 95825. I served a true copy of the attached:

DECISION AND ORDER

by mail on each of the following, by placing same in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS

CERT NO.

Kathleen Williams, Ph.D.  
116 N. Maryland Ave., Ste. 200  
Glendale, CA 91206


7000 0520 0021 8424 3219

Keith Zwillinger, Esq.  
125 S. Highway 101, Ste. 101  
Solana Beach, CA 92075

Cindy M. Lopez  
Deputy Attorney General  
300 S. Spring St., Ste. 1702  
Los Angeles, CA 90013

Each said envelope was then on, September 21, 2001, sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, as certified mail, with the postage thereon fully prepaid, and return receipt requested.

Executed on, September 21, 2001, at Sacramento, California.  
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
DECLARANT  
Mary Laackmann  
Enforcement Analyst